REMARKS/ARGUMENTS

These remarks are submitted in response to the Office Action dated March 15, 2007 (Office Action). This response is filed within the 3-month shortened statutory period, and as such, no fees are believed to be due. The Examiner is expressly authorized, however, to charge any deficiencies or credit any overpayment to Deposit Account No. 50-0951.

Claims 1-33 were rejected under 35 U.S.C. 112 as failing to comply with the enablement requirement. In particular, the Examiner has stated that the specification does not provide support for "...content markers indicating a topic, meaning, and/or purpose" in the previous claim amendments. Applicants note these amendments were made for clarifying a description of the template that includes content markers, and which is supported in the Specification. On page 17, lines 1-10, the specification provides support for a template that identifies a topic (e.g. weather), a meaning (e.g. temperature), and a purpose (e.g. present the temperature for a city). Applicants have amended the claims to identify the template as indicating a topic, meaning, and/or purpose.

Claims 1, 2, 4, 6-9, 12, 22, 24, 26-29, and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application No. 2001/0042083 to Saito, *et al.* (hereinafter Saito), in view of U.S. Patent 6,073,148 to Rowe (hereinafter Rowe). Claims 13-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Saito in view of U.S. Patent 5,911,776 to Guck (hereinafter Guck). Claims 3, 5, 10, 11, 23, 25, 30, 31 and 33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Saito, in view of Rowe, and further in view of Guck.

Applicants have amended independent Claims 1, 13, 14, 22, and 33 to further emphasize certain aspects of the invention. The claim amendments, as discussed herein, are fully supported throughout the Specification. (See, e.g., Specification, p. 17, line 11 –

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p. 18, line 13; p. 19, lines 6- p. 20, line 5; p. 23, line 17 - p. 24, line 22; and p. 25, line 1 –
22) No new matter has been introduced by the amendments.

Aspects Of The Invention

Prior to addressing the cited references, it may be useful to reiterate certain aspects of Applicants' invention. One embodiment of the invention, typified by amended Claim 1, is a method for converting formatted content. The method can include receiving from a client a content request specifying a network location from which a specified document, including formatted content, can be retrieved. The content request can also indicate a target format, according to the method. Further according to the method, a template corresponding to the specified document and the target format can be identified in response to the request.

According to the method, the template can be customized by a user to extract in one or more different combinations from the specified document information based upon the one or more content markers. The method can include applying the template to the specified document and extracting data from the formatted content based upon the template. The step of applying can include identifying a presentation order of the at least one content marker in the template, and extracting the formatted content from the specified document in accordance with the presentation order. The method further can include formatting the data in the presentation order for audible presentation to provide a second document formatted for audible presentation according to the target format.

The Claims Define Over The Prior Art

As noted above, independent Claims 1-33 were rejected as being unpatentable over Saito in view of Rowe, or as being unpatentable over Saito in view of Rowe in further view of Guck. Saito is directed to a document processing system and method that each include generating a search template for retrieving information from documents. (See, e.g., paragraphs [0006]-[0009]; see also Abstract.) Rowe is directed to a method and

apparatus for optimizing a page-based electronic document and for downloading and displaying at least a portion of the page-based document without "excessive time delays." (Col. 3, lines 44-47.) Guck is directed to an automatic format conversion system and publishing methodology for a multi-user network. In particular, an original source document can be created and then published in any specific format to multiple numbers of, and types of, receiving devices.

Applicants' have amended the claims to recite features not taught or contemplated in the cited prior art. Not Saito, Rowe, or Guck, singly or in combination, contemplates determining a presentation order (see Specification page 17, line11-page 18 line 22, "...*ordering of data as presented*") of content markers in a template wherein the content markers identify data fields containing information in a formatted content (e.g. mark-up language) of a specified document, identifying a presentation order of the content markers in the template, extracting formatted content at locations in the specified document according to the presentation order of the content markers, and formatting the information to produce a second document (e.g. voiceXML format) for audible presentation in accordance with the presentation order.

With the invention, for example, a web page containing weather related information can be converted to an audible format that is presented to a user in a sensible presentation order. A template associated with the webpage can be identified, and data fields from the webpage can be retrieved in a presentation order identified by the content markers. The content markers identify the presentation order for rendering the data in an audible format. In an audible format, the ordering of content information can be sensible or non-sensible (see Specification, page 17, line 22, "...*data can be extracted in order specified by content markers thereby making a sensible presentation*"). Audible content for spoken voice is generally presented word by word, or phrase by phrase, as would occur naturally when speaking. Whereas audible content that is presented is sensible when the presentation order of phrases is related, the audible content is non-sensible when the

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presentation order of phrases is not related. In contrast, visual content is generally sensible irrespective of order of presentation, since a user can visually scan a document to determine relations between visual content dispersed within the document.

For example, in a web page that contains a city field, a temperature field, and a date field, the fields can be ordered for presentation in accordance with an ordering of content markers in a template, such as by date, city, and field (e.g. message: "as of <date field>, the temperature is <temperature field> in the city of <city field>.) The template can identify a topic (e.g. weather) and specifically state the presentation order, which can be customized for the user. For example, a first user can specify a template that orders content markers for a weather reporting web page by <date><city><temperature> to produce sensible audio content, whereas a second user may request a presentation of <city><temperature><date> to produce sensible audio content. According to one aspect of the invention, the template describes how the formatted content in the specified document will be formatted, or rendered, for audible presentation. Additionally, template selectively identifies data fields in the specified document from the content markers. That is, instead of merely converting a first document in a first format to a second document in a second format, the content is selected according to content markers in a template, and the presentation order of the content identified according to the presentation order of the content markers.

Saito discloses generating a search template for retrieving information from documents. Saito does not contemplate using a presentation order to convert data fields from a first document having a first format to a second document having a second format. A presentation order is not necessary in Saito since the second document is presented entirely in a visual format. For instance, the date field can be formatted before the city field since the presentation of the second document is complete (i.e. the user has access to the entire document after conversion). By contrast, spoken data, is presented sequentially word by word, or phrase by phrase. In the case of spoken data, the presentation order of

the content markers determines whether the audible information is sensible or non-sensible. The template provided by the invention specifies a presentation order, thus ensuring that audible information is sensibly prepared. The template can also insert additional text to improve user understanding of the presentation order (See Specification, page 19, line 17-page 20 line 5). For example, in the weather example where only 3 data fields are provided <city=Miami>, <temp=75>, and <temp=80> the speech interface can say "Miami, high today of 80, low today of 75" by inserting "high today of" and "low today of." Non sensible speech would be produced if a presentation order was not included in the conversion (e.g. "Miami 75 80")

Rowe discloses specific methods for downloading and displaying desired pages, or portions of a page, from a document without waiting to download a font to display the pages. In particular, Rowe identifies portions of the document having high processing delays, such as those associated with rendering a downloadable font, and substituting the downloadable font for a plain font, while the downloadable font is downloaded as a background task. Rowe does not contemplate identifying a presentation order from a template, or using the presentation order to extract formatted content for audible presentation. Moreover, Rowe provides no mechanism for including a presentation order since Rowe does not include a template with which to request or specify a presentation order. In Rowe, a user does not have the option of selecting the order in which text sections are downloaded. As specified in Rowe, the text sections that require the longest processing delays are processed in advance of other sections.

Guck discloses specific methods for efficiently enabling a text or graphics created by an author to be converted to other formats suitable for other client users without the need for laborious steps for each type of format conversion required from the original author's text or graphics. Guck discloses a method for converting a text document format to an audio format for IVR systems. Applicants have described the limitations associated with simply converting a text document to an audio format. (See Specification Page 4,

lines 11-22). More specifically, substituting visually directed tags with speech directed tags can result in non-sensible speech, which can confuse a listener. For example, if a weather table having two columns for <date><city><temperature> is converted directly without regard to presentation order, the output could be either

<date><date><city><city><temperature><temperature>,or

<date><city><temperature><date><city><temperature>

depending on whether a by-column or by-row extraction is performed.

Guck does not teach or contemplate identifying a presentation order of content markers in a template or using the presentation order to format the data in the text document for audible presentation. Guck merely states that a document can be converted to an audible format, without further clarification. Guck provides no teaching for converting data in one mark-up language to an audible mark-up language. Moreover, Guck does not disclose selecting data fields from content markers from a template. Accordingly, a direct conversion of the exemplary weather table in accordance with the teachings of Gluck would result in a non-sensible presentation since the data fields have not been specified in any order.

Regarding rejection of Independent Claim 1, Saito and Rowe, singly or in combination, do not teach identifying a presentation order of at least one content marker in a template, and extracting the formatted content from the specified document in accordance with a presentation order

Regarding rejection of Claim 6 and 7, Rowe does not teach identifying a presentation order of at least one content marker in a template. Rowe discloses an offset for extracting content, but does not teach creating and identifying a presentation order for extracting content.

Regarding rejection of Independent Claim 22, Saito and Rowe, singly or in combination, do not teach identifying a presentation order of at least one content marker in a template, and extracting the formatted content from the specified document in accordance with the presentation order

Regarding rejection of Independent Claims 13 and 14, Saito discloses that predetermined information is generally stored as search templates or extraction criteria (page 1, paragraph [0002], page 3, paragraphs 0042-0045, and page 5.) Saito also discloses that a user defined search template can be generated (page 1, paragraph [0006], and page 5, paragraphs 0050-0055.) Saito also contemplates tagging an extracted element to ensure the element is not extracted multiple times. Guck discloses a method in which a template (shadow file) corresponds to a document that is used to convert contents of the document to a specific mark-up language (Column 4, line 40-Column 5, line 24 and FIG 8). Saito fails, however, to teach or suggest the features recited in Claims 13 and 14.

Regarding rejection of Independent Claim 33, Saito does not teach content markers that are ordered based on the order in which the data is presented (Fig 15, paragraph [0002], and paragraphs [0050-0055]). Saito does not contemplate an ordering of the content markers in the template to establish how content is ordered for audible presentation. Saito only discusses assigning a sequential number to indicate relative position among the elements to eliminate an error of extracting the same element more that once when the elements appear in order. The term "order" as used by Saito merely states the order in which the elements are processed. Saito does not contemplate allowing a user to create a template which orders the content markers in a predetermined arrangement. That is, Saito does not contemplate a template that describes a presentation order for extracting formatted content from a specified document.

Saito and Guck, singly or in combination, do not teach identifying a presentation order of the at least one content marker in a template, and extracting the formatted content from the specified document in accordance with the presentation order. Guck does not teach formatting data for audible presentation in the presentation order based upon a

template, wherein the formatting produces a second document formatted for audible presentation according to the target format. Again, Guck does not contemplate any disadvantages to converting a markup language to an audible format, which can result in non-sensible speech (See Specification page 4, lines 11-22). Accordingly, it would not be obvious to one skilled in the art to combine the methods of Saito and Rowe with the teachings of Guck, since none of the references contemplate a need for presentation ordering.

Applicants' invention clearly teaches use of a template that includes an ordering of content markers that can be used to order a presentation of content in a sensible manner that overcomes the disadvantages of standard mark-up language conversion taught by Guck (See Applicants' specification page 17, line 11- page 18, line 13 ..."*the order of content markers in the template can dictate the order of presentation using the second mark-up language*", and "*Though the aforementioned data may be fragmented throughout the received document, the data can be extracted in the order specified by the content markers thereby making a sensible presentation for an end user*").

Applicants respectfully assert that whereas Saito fails to expressly or inherently teach each of the features recited in amended independent Claims 1, 13, 14, and 22, the claims are not anticipated by the prior art. Saito, Rowe, and Guck, singly or in combination, fail to teach or suggest the features of the present invention as claimed. Withdrawal of the 35 U.S.C 103(a) rejection regarding claims 1, 13, 14, 22, and 33 is thus respectfully requested. Applicants respectfully assert that whereas each of the remaining claims depend from one of amended independent claims while reciting additional features, these dependent claims likewise define over the prior art. Applicants, therefore, respectfully request withdrawal of the rejection of Claims 1-33.
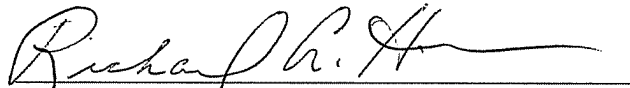
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CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: **May 15, 2007**

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